

NANCI L. CLARENCE SBN 122286
CRAIG BESSENGER, SBN 245787
CLARENCE & DYER LLP
899 Ellis Street
San Francisco, CA 94109
Telephone: (415) 749-1800
Facsimile: (415) 749-1694
Email: nclarence@clarencedyer.com
cbessenger@clarencedyer.com

Attorneys for Defendant Martin William Washburn

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

vs.

DONALD DANIELS, MARTIN WILLIAM
WASHBURN, TAPANI KOIVUNEN, and IRINA
REBEGENEAU,

Defendants.

Case No.: CR-09-0862 MHP

**STIPULATED REQUEST FOR ORDER
MODIFYING DEFENDANT'S BOND AND
CONDITIONS OF PRETRIAL RELEASE**

On September 17, 2009, this Court signed an order releasing Defendant MARTIN WILLIAM WASHBURN from custody on a \$200,000 unsecured bond and imposing various conditions of release. Since that time the parties have agreed to increase the bond to \$500,000 and to secure it with property located at 21150 Uvas Road in Morgan Hill, California, which property is owned by Mr. Washburn and his wife. In addition, the parties have agreed to the following additional condition of release: "Neither Mr. nor Mrs. Washburn shall draw on any line of credit secured by, or otherwise further encumber, real property located at 21150 Uvas Road in Morgan Hill, CA without notice to the United States and prior approval of the Court."

1 The above information has been provided to Mr. Washburn's pretrial services officer.
2 IT IS SO STIPULATED.

3
4 Dated: 10/30/09

5 /s/: Peter Axelrod
6 PETER AXELROD
7 Assistant United States Attorney

8 Dated: 10/30/09

9 /s/: Nanci L. Clarence
10 Nanci L. CLARENCE

11 CLARENCE & DYER
12 Attorneys for Defendant, Martin William Washburn

13 **IT IS SO ORDERED.**

14 November 2, 2009



Proof of Service

I, Abbie Chin, declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of San Francisco.

On October 30, 2009, I served a copy, with all exhibits, of the following documents:

- Stipulated Request For Order Modifying Defendant's Bond and Conditions of Pretrial Release

 X (BY FAX) By transmitting by facsimile machine to the number addressed as below; the facsimile machine I used complied with California Rules of Court, rule 2003 and no error was reported by the machine. Pursuant to California Rules of Court, rule 2006(d), I caused the machine to print a transmission record of the transmission.

 X (BY ELECTRONIC SERVICE) I caused an electronic delivery subject to 28 U.S.C ¶1746, Local Rules or General Orders of this Court regarding Electronic Case Filing. All pleadings and papers must be electronically served in accordance with those Rules or General Orders with email address(es) as noted below:

Via Electronic Service
Peter Axelrod, AUSA
450 Golden gate Avenue, 11th Floor
San Francisco, CA 94102
Fax: (415) 436-7234

Via Fax
Laura Weigel
Pretrial Services
280 S. First Street, Suite 1150
San Jose, CA 95113
Fax: (408) 535-5227

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct and that this declaration was executed on the above stated date.

/s/: Abbie Chin

Abbie Chin